



1666 Fabick Drive  
St. Louis, MO 63026  
636-227-7477  
FAX 636-227-6447

October 21, 2011

Mr. Jeffrey W. Adams  
Industrial Hygienist, CDPHE APCD  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530

RE: Variance Request Response, Eaton Sugar Beet Factory

Dear Mr. Adams,

Please find herein Environmental Restoration LLC's (ERLLC) response to your request for additional information regarding work area 10 at the Eaton Sugar Beet Factory (ESBF). We are referring to work area 10 as the Kiln/Dry building for the purposes of this request.

Koch Environmental Health, Inc. (KEH) conducted an asbestos assessment of the Kiln/Dry building to determine the extent, if any, of asbestos contamination within the structure. The north portion of the Kiln/Dry structure is approximately 2900 ft<sup>2</sup> and is separated from the south portion of the structure by a brick firewall. There is a significant amount of dirt, debris, animal bones/droppings, and damaged building materials that is approximately 2" deep spread throughout the floor of the building. No suspect ACM was observed on the floor of the structure. Asbestos-containing TSI was observed in the following locations within the structure (see attached photos):

- There is approximately 20 linear feet of TSI underneath an overhang on the south side of the structure. The TSI is on a 3" pipe and is located approximately 10 feet above the ground. The TSI is damaged although there is no visible suspect TSI debris beneath it or underneath the overhang.
- TSI was observed on a large pipe on the south lime roaster. KEH could not determine the amount of material on the south lime roaster from the ground level as it is located near the top of the structure. No visible suspect TSI debris was observed on the ground beneath the pipe.
- Asbestos-containing sealant is present on several penetrations on the lime roasters. The material is cementitious and appears to be in good condition.

ERLLC is providing the following information in response to your request for documentation that the Kiln/Dry building is not asbestos-contaminated:

Koch Environmental Health collected samples of soil/debris in 12 different locations on the ground of the structure for analysis by Polarized Light Microscopy on October 12, 2011. Samples were collected in large (1 gallon) sealable storage bags such that each sample represented approximately ½ gallon of material. Samples were collected in areas directly beneath existing TSI, beneath the "crow's nest", and from other areas of the floor deemed by the Asbestos Inspector to be "worst case" with respect to the amount of debris in those locations. See the attached sketch for exact sample locations. No asbestos was detected in any of the 12 soil/debris samples. Sample descriptions, locations and results are described below:

Sample Descriptions, Locations, and Results

Sample #	Date	Sample Description & Location	Type S,T,M	Condition G,D,SD,PSD	Estimated QTY	Results (%asbestos)
1012-01	10/12/11	Soil / Debris, Kiln/Dry Bldg. - S. end beneath TSI pipe	M	-	-	ND
1012-02	10/12/11	Soil / Debris, Kiln/Dry Bldg. - N. side center, outside of overhang	M	-	-	ND
1012-03	10/12/11	Soil / Debris, Kiln/Dry Bldg. - E. side outside of overhang	M	-	-	ND
1012-04	10/12/11	Soil / Debris, Kiln/Dry Bldg. - center of building, N. of S. kiln stack	M	-	-	ND
1012-05	10/12/11	Soil / Debris, Kiln/Dry Bldg. - inside W. entry on floor	M	-	-	ND
1012-06	10/12/11	Soil / Debris, Kiln/Dry Bldg. - E. center of building	M	-	-	ND
1012-07	10/12/11	Soil / Debris, Kiln/Dry Bldg. - E. side N. end beneath crows nest	M	-	-	ND
1012-08	10/12/11	Soil / Debris, Kiln/Dry Bldg. - N. side of N. kiln stack	M	-	-	ND
1012-09	10/12/11	Soil / Debris, Kiln/Dry Bldg. - N. end center	M	-	-	ND
1012-10	10/12/11	Soil / Debris, Kiln/Dry Bldg. - W. center beneath crows nest	M	-	-	ND
1012-11	10/12/11	Soil / Debris, Kiln/Dry Bldg. - E. center beneath crows nest	M	-	-	ND
1012-12	10/12/11	Soil / Debris, Kiln/Dry Bldg. - E. side under overhang beneath bare TSI pipe	M	-	-	ND

Based on visual observations and soil/debris sample results indicating no asbestos detected, the Kiln/Dry building is not considered asbestos-contaminated, although there is asbestos-containing TSI and sealant present within the structure. ERLLC proposes to conduct removal of asbestos-containing TSI and sealant via the methods described below.

#### TSI Removal

ERLLC is providing the following information in response to your request pertaining to component removal of TSI within the Kiln/Dry structure and work area 10 of the Asbestos Project Design previously submitted.

ERLLC will erect a mini-containment around the ground-level TSI beneath the overhang and then remove the pipe and TSI via component removal methods. Aggressive final clearance sampling via PCM will be conducted by a CDHPE-certified AMS within the mini-containment upon completion of component removal and final cleaning.



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ERLLC will erect a mini-containment around the large pipe on the south lime roaster and remove the TSI via glovebag methods. ERLLC will access the work area using one or more manlifts and will erect the mini-containments and conduct abatement from the manlift(s). Aggressive final clearance sampling via PCM will be conducted by a CDHPE-certified AMS within the mini-containment upon completion of removal and final cleaning.

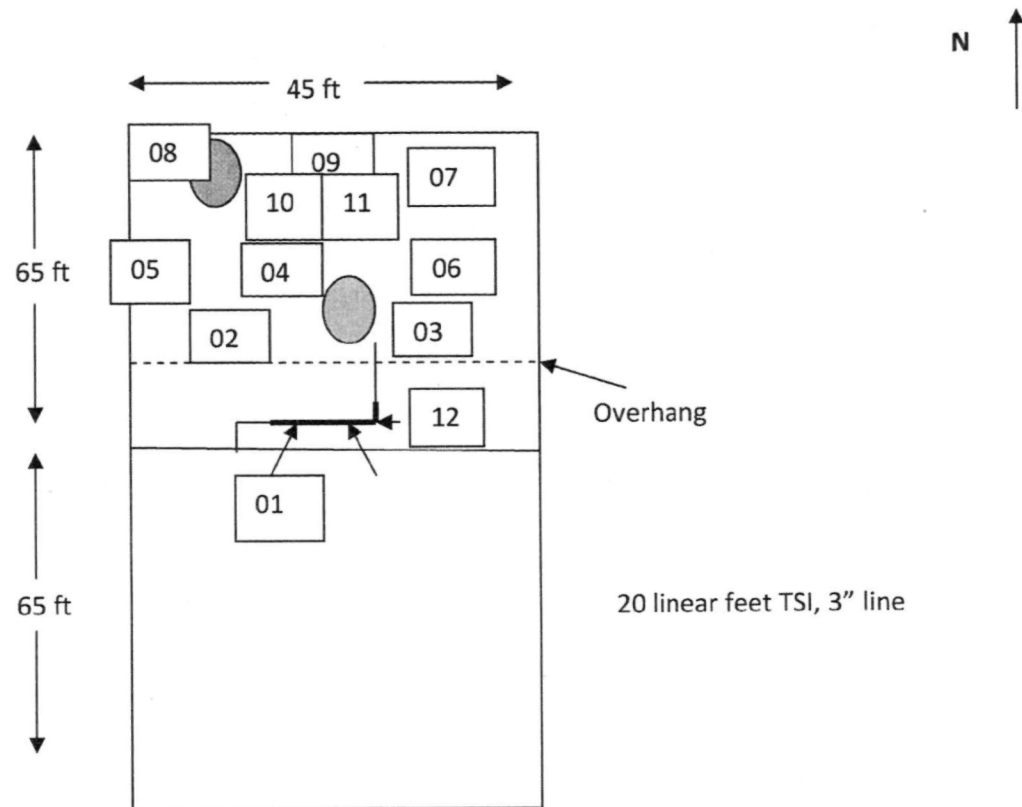
ERLLC will erect mini-containments at each cementitious sealant penetration location and perform removal via glovebag methods. Alternatively, if the sealant penetrates the component and is unavailable for removal by glove bag, ERLLC may elect to seal the outside of the material with encapsulate and torch cut around the penetration and completely remove the ACM portion of the component. Aggressive final clearance sampling via PCM will be conducted by a CDHPE-certified AMS within the mini-containment upon completion of removal and final cleaning.

Please refer to the attached sample location sketch and photos to supplement the information provided above. Please contact me at (303) 994-6611 if you have any questions or comments. Thank you for your consideration in this matter.

Best Regards,

A handwritten signature in black ink, appearing to read 'Matt Francis', with a stylized flourish at the end.

Matt Francis  
ERLLC



**EATON SUGAR BEET FACTORY KILN/DRY BUILDING  
SOIL/DEBRIS SAMPLE LOCATIONS, OCT. 12, 2011**

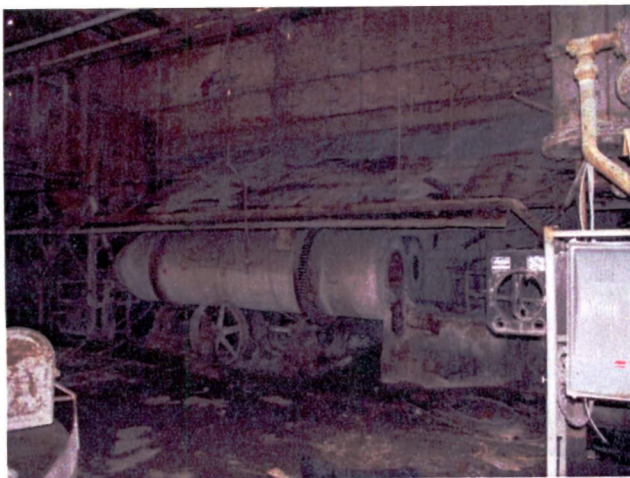
Not to Scale



View from north



Top of structure



"Overhang" (TSI beneath overhang)



20 l.f. TSI under overhang



West side of structure  
(note arrow depicting firewall)



Adjacent north building showing firewall  
partition between buildings





"Crow's nest" at top of building



Center of floor depicting debris (no suspect ACM)



Closeup of debris on floor



South side of floor debris



Asbestos-containing sealant on south lime roaster  
(photo provided by EPA START contractor URS)



TSI on pipe, south lime roaster  
(photo provided by EPA START contractor URS)